

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

VOYAGER DIGITAL HOLDINGS, INC., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 22-10943 (MEW)
)
) (Jointly Administered)
)

**DECLARATION OF MARK A. RENZI IN SUPPORT OF
DEBTORS' OMNIBUS OBJECTION TO (I) THE VOTING AMOUNT
ASSOCIATED WITH CERTAIN DISPUTED ACCOUNT HOLDER CLAIMS
AND (II) THE MERITS OF CERTAIN DISPUTED ACCOUNT HOLDER CLAIMS**

I, Mark A. Renzi, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury as follows:

1. I submit this declaration in support of the *Debtors' Omnibus Objection to (I) the Voting Amount Associated with Certain Disputed Account Holder Claims and (II) the Merits of Certain Disputed Account Holder Claims* [Docket No. 993] (the "Objection") and the *Notice of Filing of Amended Schedules Relating to the Debtors' Omnibus Objection to (I) the Voting Amount Associated with Certain Disputed Account Holder Claims and (II) the Merits of Certain Disrupted Account Holder Claims* [Docket No. 1002].² I am a Managing Director at Berkeley Research Group, LLC ("BRG") and have served as financial advisor to Voyager Digital Holdings, Inc., and its Debtor affiliates since June 30, 2022.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital, Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Debtors' principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

² Capitalized terms used but not defined herein have the meanings ascribed to such terms in the Objection.

2. The statements in this declaration are, except where specifically noted, based on my personal knowledge or opinion, on information that I have received from the Debtors' employees or advisors, or employees of BRG working directly with me or under my supervision, direction, or control, or from the Debtors' Books and Records maintained in the ordinary course of their business. If I were called upon to testify, I could, and would, competently testify to the facts set forth herein on that basis. I am authorized to submit this declaration on behalf of the Debtors.

3. In evaluating the Disputed Claims, the Debtors, with the assistance of BRG and the Debtors' other advisors, thoroughly reviewed their Books and Records and the relevant Proofs of Claim, as well as the supporting documentation provided by each Claimant, if any, and have determined that each Disputed Claim should be reduced and allowed, reclassified, or disallowed, as applicable, as set forth in the Objection. As such, I believe that the reduction and allowance, reclassification, or disallowance as applicable, of the Disputed Claims on the terms set forth in the Objection, consistent with the treatment set forth for each Disputed Claim on Schedule 1 and Schedule 2, attached as Exhibit 1 to the Voting Objection Order, and on Schedule 1, Schedule 2, and Schedule 3, attached as Exhibit 1 to the Merit Objection Order, and which reflect the amounts listed in the Debtors' Books and Records for such Disputed Claims, is appropriate.

A. Disputed Claims.

4. After reviewing their Books and Records and the applicable Proofs of Claim, the Debtors, with the assistance of their advisors, determined that each Disputed Amount Claim listed on Schedule 1 to the Voting Objection Order and Schedule 1 to the Merit Objection Order assert amounts that are not actual liabilities of the Debtors. Accordingly, I believe the Disputed Amount Claims should be reduced and allowed, or disallowed as applicable, to reflect the Debtors' scheduled amount for voting and allowance purposes.

5. Further, the Debtors and their advisors determined that certain Disputed USD Claims listed on Schedule 2 to the Voting Objection Order and Schedule 2 to the Merit Objection Order improperly listed all or a portion of their Account Holder Claim in U.S. Dollars (the “Disputed USD Claims”). I understand that the Debtors did not hold cash for Account Holders who transacted on the Debtors’ platform. Rather, Metropolitan Commercial Bank held Cash on behalf of Account Holders in that certain “for the benefit of” account (the “FBO Account”), and all Account Holders were allowed to withdraw their cash from the FBO Account pursuant to that *Order (I) Authorizing the Debtors to (A) Honor Customer Withdrawals from the MC FBO Accounts, (B) Liquidate Cryptocurrency from Customer Accounts with a Negative Balance, (C) Sweep Cash Held in Third-Party Exchanges, (D) Conduct Ordinary Course Reconciliation of Customer Accounts, and (E) Continue to Stake Cryptocurrency, and (II) Granting Related Relief* (the “FBO Order”) [Docket No. 247]. I have been informed that the FBO Account was closed on February 6, 2023 at 8 p.m. EST (the “FBO Closing Date”), and that any Account Holders that did not withdraw cash held in the FBO Account prior to the FBO Closing Date will be sent a check to their last known address. Accordingly, I believe that the Disputed USD Claims should be disallowed for voting and allowance purposes as requested in the Objection.

6. I understand that failure to reduce and allow or disallow the Disputed Claims, as applicable, on the merits could result in certain Claimants receiving an unwarranted recovery against the Debtors to the detriment of other creditors. Therefore, I believe the Disputed Claims should be reduced and allowed, or disallowed, as applicable, to reflect the scheduled amounts as requested in the Objection.

7. Additionally, the Debtors and their advisors determined that certain of the Disputed Claims assert a priority status that is not supported by the Bankruptcy Code. Accordingly, I believe

such Disputed Claims should be reclassified as general unsecured claims as set forth in the Objection.

B. Account Holders' Asserted Claims.

8. In response to the Objection, I understand that the Debtors received informal responses from certain customers that assert their filed claims are correct, but do not account for the reconciliation of the negative U.S. dollar balances in their accounts following ACH Chargebacks (as defined below). As explained more fully in the *Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue to Perform Intercompany Transactions, (II) Granting Superpriority Administrative Expense Status to Postpetition Intercompany Balances, and (III) Granting Related Relief* (the "Cash Management Motion") [Docket No. 10], automated clearing house ("ACH") transactions, while critical to the Debtors' flow of funds, also leave the Debtors susceptible to fraudulent chargebacks by Account Holders (the "ACH Chargebacks"). Such ACH Chargebacks occur when an Account Holder purchases cryptocurrency on the Debtors' platform, and *after* the Debtors purchase such cryptocurrency at the Account Holder's instruction, the Account Holder informs their bank that such purchase was unauthorized. The Account Holder's bank will then unilaterally reverse the ACH transfer, leaving the Account Holder with both the purchased cryptocurrency *and* the funds meant to pay for the purchase and leaving the Debtors with a corresponding deficit in the FBO Account. As a result, a negative U.S. dollar balance is reflected in the Account Holder's Voyager account.

9. To remedy negative U.S. dollar balances, I understand that the Debtors historically liquidated cryptocurrency assets from Account Holders' accounts sufficient to offset the negative balance associated with such Account Holder in the FBO Account. The Debtors obtained authority

pursuant to the FBO Order to continue to liquidate cryptocurrency to reconcile negative U.S. dollar balances in Account Holders' accounts where appropriate.

10. Prior to resuming their reconciliation efforts, I understand that the Debtors sent letters to Account Holders with negative U.S. dollar balances (each, an "ACH Letter") to provide such Account Holders the opportunity to correct the negative balances consistent with the authority granted under the Cash Management Orders.³ The Debtors only liquidated the portion of a customer's cryptocurrency assets necessary to reconcile that Account Holder's negative U.S. Dollar balance if the Account Holder failed to return the funds.

³ The Debtors have continued to operate their cash management system postpetition, including ACH Chargebacks, pursuant to the *Interim Order (I) Authorizing the Debtors to (A) Continue to Operate their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue to Perform Intercompany Transactions, (II) Granting Superpriority Administrative Expense Status to Postpetition Intercompany Balances, and (III) Granting Related Relief* [Docket No. 53], *Second Interim Order (I) Authorizing the Debtors to (A) Continue to Operate their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue to Perform Intercompany Transactions, (II) Granting Superpriority Administrative Expense Status to Postpetition Intercompany Balances, and (III) Granting Related Relief* [Docket No. 237], *Third Interim Order (I) Authorizing the Debtors to (A) Continue to Operate their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue to Perform Intercompany Transactions, (II) Granting Superpriority Administrative Expense Status to Postpetition Intercompany Balances, and (III) Granting Related Relief* [Docket No. 580], *Fourth Interim Order (I) Authorizing the Debtors to (A) Continue to Operate their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue to Perform Intercompany Transactions, (II) Granting Superpriority Administrative Expense Status to Postpetition Intercompany Balances, and (III) Granting Related Relief* [Docket No. 641], and the *Final Order (I) Authorizing the Debtors to (A) Continue to Operate their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue to Perform Intercompany Transactions, (II) Granting Superpriority Administrative Expense Status to Postpetition Intercompany Balances, and (III) Granting Related Relief* [Docket No. 983] (collectively, the "Cash Management Orders").

C. Robert Beaucage’s Asserted Claim

Cryptocurrency	Scheduled Claim (August 18, 2022) [Docket No. 7]	Asserted Claim (September 22, 2022) Proof of Claim No. 10137	Amended Scheduled Claim (November 18, 2022) [Docket No. 18]
Cardano (ADA)	1,419.1	1,419.1	1,280.2
Bitcoin (BTC)	0.632627	0.632627	0.570739
Dogecoin (DOGE)	4.0	4.0	3.6
Polkadot (DOT)	0.373	0.373	0.336
Ethereum (ETH)	2.68198	2.68198	2.41961
Locked Luna (LLUNA)	11.952	11.952	11.952
Terra Luna (LUNA)	5.123	5.123	4.621
Luna Classic (LUNC)	16.6	16.6	15.0
Shiba Inu (SHIB)	1,300,081,840	1,300,081,840	1,172,897,853.9
Voyager Token (IVGX)	503.41	503.41	454.16

11. On February 21, 2023, Robert Beaucage filed a *Motion Seeking the Temporary Allowance of a Claim in the Amount Listed on the Proof of Claim for Voting Purposes Pursuant to Rule 3018* [Docket No. 1032], seeking to vote in the amount of his asserted claim. It is my understanding that the Debtors objected to Mr. Beaucage’s asserted claim in the amount listed in the September 22, 2022 “Asserted Claim” above because that amount did not match the Debtors’ Books and Records in the Debtors *Second Amended Schedules of Assets and Liabilities of Voyager Digital, LLC (Case No. 22-10945)* (the “Amended Schedules”) [Docket No. 18]. I have reviewed Mr. Beaucage’s asserted claim, and it is equal to the amount that was in his account shortly before the Petition Date and matches the Debtors’ original *Schedules of Assets and Liabilities of Voyager Digital LLC (Case No. 22-10945)* (the “Schedules”) [Docket No. 7]. However, I am aware that around the time of the Petition Date, Mr. Beaucage requested the return of \$300, \$2,000 and \$2,000 respectively (totaling \$4,300 in funds) when he had just \$1,369.18 in funds in his account, which

resulted in ACH Chargebacks beyond the amount of U.S. dollars held by Mr. Beaucage in the FBO Account, resulting in a negative balance of \$2,930.82 in his account.⁴

12. Accordingly, the Debtors sent Mr. Beaucage an ACH Letter on July 14, 2022, attached hereto as **Exhibit A**, alerting him that the Debtors were investigating certain ACH Chargebacks associated with his account and that the Debtors intended to take all action to protect their rights. The Debtors never received a response from Mr. Beaucage and he otherwise failed to correct his negative U.S. dollar balance. Therefore, on October 31, 2022, the Debtors, in compliance with the FBO Order, liquidated that portion of Mr. Beaucage's cryptocurrency assets necessary to setoff the ACH Chargebacks which left a U.S. Dollars deficiency in his account.⁵

13. This liquidation explains the difference between Mr. Beaucage's asserted claim and his scheduled claim. That is, the difference between Mr. Beaucage's asserted claim and his scheduled claim is equal to the amount of cryptocurrency the Debtors liquidated pursuant to the FBO Order to recover his negative balance.

14. Mr. Beaucage's scheduled claim is correct based on the Debtors' Books and Records following the Debtors' court-authorized reconciliation pursuant to the relief granted under the FBO Order. Mr. Beaucage is only properly entitled to recover based on his amended scheduled claim, not his original scheduled claim and not his asserted claim.

⁴ A table of Mr. Beaucage's account balance on July 6, 2022, after the postpetition ACH Chargebacks were completed, and October 31, 2022, reflecting the changes in his account, is attached hereto as **Exhibit B**. Screenshots of the activity resulting in these changes is attached hereto as **Exhibit C**.

⁵ The Debtors' reconciliation of Mr. Beaucage's cryptocurrency, including coin, amount liquidated, liquidated price, and date of the liquidation is attached hereto as **Exhibit D**.

D. Deborah Soto's Asserted Claim

Cryptocurrency	Asserted Claim (August 18, 2022) Proof of Claim. No. 8422
Bittorent (BTT)	8,969,792,148.0
Ethereumclassic (ETC)	62.1
Fantom (FTM)	2,001.435
Dogecoin (DOGE)	10,000.8
Shibainu (SHIB)	108,912,814.1
Polygon (MATIC)	1,002.25
Sandbox (SAND)	2,000.0
Lunaclassic (LUNC)	7,540,482.0
Lockedluna (LLUNA)	21.0

15. It is my understanding that the Debtors objected to Deborah Soto's claim because Ms. Soto did not have an active account on the Debtors' platform as of the Petition Date. Therefore, I understand that she could not have stored any cryptocurrency on the Debtors' platform and been an ongoing customer as of the Petition Date. As a result, Ms. Soto was not listed in the Debtors' Schedules or their Amended Schedules. I am aware that, prior to the Petition Date, Ms. Soto had an account on the Debtors' platform. However, I am aware that Ms. Soto's account was deactivated on June 13, 2022 due to a negative account value and funding failures. It is my understanding that the current value of her closed account is a negative balance of -\$11,880.54. Further, I am aware Ms. Soto made multiple attempts to fund her account, totaling \$56,200, but due to insufficient funds in her bank account, the Debtors received notification of a total of \$42,700 in ACH Chargebacks from her bank. ⁶

⁶ A record of Ms. Soto's denied funding attempts and her ACH Chargebacks are attached hereto as **Exhibit E**.

16. It is my understanding based on these facts that Ms. Soto did not have an account on the Debtors' platform as of the Petition Date and does not hold any claim against the Debtors' Estates. The Debtors are not liable for the asserted claim by Ms. Soto because she does not hold a claim against the Debtors.

[Remainder of page intentionally left blank.]

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Dated: February 21, 2023
New York, New York

/s/ Mark A. Renzi

Mark A. Renzi
Managing Director
Berkeley Research Group, LLC

Exhibit A

ACH Letter

KIRKLAND & ELLIS LLP

AND AFFILIATED PARTNERSHIPS

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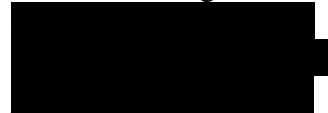
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July 14, 2022

Robert Beaucage



Re: Fraudulent ACH Chargeback Requests

Dear Robert Beaucage:

We represent Voyager Digital Ltd. and its affiliates (collectively, “Voyager”) in connection with their pending cases under title 11 of the United States Code (the “Chapter 11 Cases”) in the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”). Voyager commenced the Chapter 11 Cases on July 5, 2022 (the “Petition Date”).

It has come to Voyager’s attention that you requested to revoke certain ACH transactions made on Voyager’s platform for the purchase of cryptocurrency assets. Please be advised that requesting that a valid ACH transfer be reversed based on a false claim that the transaction was not authorized is clearly illegal—it is, among other things, wire fraud in violation of 18 U.S.C. § 1343 (such requests, “Fraudulent ACH Chargebacks”).

As part of the Chapter 11 Cases, Voyager obtained authority from the Bankruptcy Court to investigate, dispute and prosecute any unauthorized or illegitimate Fraudulent ACH Chargebacks under any “for the benefit of” accounts held at Metropolitan Commercial Bank, including the accounts in which you have sought to revoke your ACH transaction(s). Voyager in fact intends to thoroughly investigate all chargeback requests, it has begun that investigation, and it will take any and all necessary actions to protect its rights to the fullest extent permitted under applicable law to the extent that any fraudulent activity is uncovered. Voyager will prosecute any Fraudulent ACH Chargebacks and/or demand that all transferred funds be recovered and paid back to the applicable “for the benefit of” account. Voyager writes to put you on notice of this investigation, and it reserves all rights with respect to any damages that may arise from, or relate to, actions taken by you in violation of applicable laws.

Sincerely,

Christine A Okike, P.C.

Exhibit B

Robert Beaucage's Account Balance

Cryptocurrency	Balances Prior to Chargebacks (July 6, 2022)	Balances After All Chargebacks Were Completed Postpetition	Balances After Reconciliation through Cryptocurrency Liquidation (October 31, 2022)
U.S. Dollars	\$1,369.18	(\$2,930.82)	\$0.00
Cardano (ADA)	1,419.1	1,419.1	1,280.2
Bitcoin (BTC)	0.632627	0.632627	0.570739
Dogecoin (DOGE)	4.0	4.0	3.6
Polkadot (DOT)	0.373	0.373	0.336
Ethereum (ETH)	2.68198	2.68198	2.41961
Locked Luna (LLUNA)	11.952	11.952	11.952
Terra Luna (LUNA)	5.123	5.123	4.621
Luna Classic (LUNC)	16.6	16.6	15.0
Shiba Inu (SHIB)	1,300,081,840	1,300,081,840	1,172,897,853.9
Voyager Token (IVGX)	503.41	503.41	454.16

Exhibit C

Robert Beaucage's Account Activity

Chargebacks⁷ reflected in Voyager's system:

Deposits for Robert Beaucage [REDACTED]						User	Search for deposits
Deposits	Type	Amount	Asset	Instant Deposit	User	Status	
Jun 19, 2022 11:42 PM EDT [REDACTED]	BANK	2,000	USD	0	Robert Beaucage (filter) [REDACTED]	RETURNED	
May 15, 2022 2:29 PM EDT [REDACTED]	BANK	2,000	USD	0	Robert Beaucage (filter) [REDACTED]	RETURNED	
May 4, 2022 3:18 PM EDT [REDACTED]	BANK	300	USD	0	Robert Beaucage (filter) [REDACTED]	RETURNED	

Evidence of ACH deposit chargebacks in the USIO payment processor portal:

Date	Account Name	Type	Acct #	Confirmation #	Message	Amount
6/19/2022	Robert Beaucage	ACH	[REDACTED]	[REDACTED]	RETURNED	\$2000.00
5/15/2022	Robert Beaucage	ACH	[REDACTED]	[REDACTED]	RETURNED	\$2000.00
5/4/2022	Robert Beaucage	ACH	[REDACTED]	[REDACTED]	RETURNED	\$300.00

Evidence of Requests to Withdraw U.S. Dollar Deposits:

Payment Details			
Payment Date: 5/4/2022 2:18:51 PM	Return Date: 7/7/2022 7:48:37 AM	Merchant ID: [REDACTED]	Account Name: Robert Beaucage
Customer Account: [REDACTED]	Account Type: ACH	Payment Type: [REDACTED]	Payment Origination: [REDACTED]
Account Number: [REDACTED]	Routing Number: [REDACTED]	ACH Trace Number: [REDACTED]	Credit Card Exp Date: [REDACTED]
SEC Code: [REDACTED]	Confirmation ID: [REDACTED]	Orig Confirmation ID: [REDACTED]	Transaction Message: RETURNED
Final Status: [REDACTED]	Authorization Code: [REDACTED]	Amount: \$300.00	Previously Returned Amount: \$0.00
ConvFee Amount: \$0.00	Account Code 1: [REDACTED]	Account Code 2: [REDACTED]	Account Code 3: [REDACTED]
ACH Description: [REDACTED]	ACH Option 1: [REDACTED]	ACH Option 2: [REDACTED]	User ID: [REDACTED]
ACH Addenda Data: [REDACTED]	Merchant Account: [REDACTED]	Additional Search: [REDACTED]	Address 1: [REDACTED]
Address 2: [REDACTED]	City: [REDACTED]	State: [REDACTED]	Zip: [REDACTED]
Province: [REDACTED]	Country: [REDACTED]	Email Address: [REDACTED]	IP Address: [REDACTED]

⁷ All chargebacks were initiated for the reason "Customer Advises Entry Not in Accordance with the Terms of the Authorization."

Payment Details

Payment Date: 5/15/2022 1:29:44 PM	Return Date: 7/7/2022 7:48:37 AM	Merchant ID: [REDACTED]	Account Name: Robert Beaucage
Customer Account: [REDACTED]	Account Type: ACH	Payment Type: [REDACTED]	Payment Origination: [REDACTED]
Account Number: [REDACTED]	Routing Number: [REDACTED]	ACH Trace Number: [REDACTED]	Credit Card Exp Date: [REDACTED]
SEC Code: [REDACTED]	Confirmation ID: [REDACTED]	Orig Confirmation ID: [REDACTED]	Transaction Message: RETURNED
Final Status: [REDACTED]	Authorization Code: [REDACTED]	Amount: \$2,000.00	Previously Returned Amount: \$0.00
ConvFee Amount: \$0.00	Account Code 1: [REDACTED]	Account Code 2: [REDACTED]	Account Code 3: [REDACTED]
ACH Description: [REDACTED]	ACH Option 1: [REDACTED]	ACH Option 2: [REDACTED]	User ID: [REDACTED]
ACH Addenda Data: [REDACTED]	Merchant Account: [REDACTED]	Additional Search: [REDACTED]	Address 1: [REDACTED]
Address 2: [REDACTED]	City: [REDACTED]	State: [REDACTED]	Zip: [REDACTED]
Province: [REDACTED]	Country: [REDACTED]	Email Address: [REDACTED]	IP Address: [REDACTED]

Payment Details

Payment Date: 6/19/2022 10:42:39 PM	Return Date: 7/6/2022 7:53:14 AM	Merchant ID: [REDACTED]	Account Name: Robert Beaucage
Customer Account: [REDACTED]	Account Type: ACH	Payment Type: [REDACTED]	Payment Origination: [REDACTED]
Account Number: [REDACTED]	Routing Number: [REDACTED]	ACH Trace Number: [REDACTED]	Credit Card Exp Date: [REDACTED]
SEC Code: [REDACTED]	Confirmation ID: [REDACTED]	Orig Confirmation ID: [REDACTED]	Transaction Message: RETURNED
Final Status: [REDACTED]	Authorization Code: [REDACTED]	Amount: \$2,000.00	Previously Returned Amount: \$0.00
ConvFee Amount: \$0.00	Account Code 1: [REDACTED]	Account Code 2: [REDACTED]	Account Code 3: [REDACTED]
ACH Description: [REDACTED]	ACH Option 1: [REDACTED]	ACH Option 2: [REDACTED]	User ID: [REDACTED]
ACH Addenda Data: [REDACTED]	Merchant Account: [REDACTED]	Additional Search: [REDACTED]	Address 1: [REDACTED]
Address 2: [REDACTED]	City: [REDACTED]	State: [REDACTED]	Zip: [REDACTED]
Province: [REDACTED]	Country: [REDACTED]	Email Address: [REDACTED]	IP Address: [REDACTED]

Exhibit D

Reconciliation of Robert Beaucage's Account

Voyager accounting adjustments made on October 31, 2022 to Robert Beaucage's account to reconcile negative balance (these transactions are viewable in the customers transaction history in-app):

Oct 31, 2022 7:19 PM EDT [REDACTED]	ADMIN	-0.0618885	BTC	0	Robert Beaucage (filter) [REDACTED]
Oct 31, 2022 7:19 PM EDT [REDACTED]	ADMIN	-49.24814672	VGX	0	Robert Beaucage (filter) [REDACTED]
Oct 31, 2022 7:19 PM EDT [REDACTED]	ADMIN	-127,183,986.13111454	SHIB	0	Robert Beaucage (filter) [REDACTED]
Oct 31, 2022 7:19 PM EDT [REDACTED]	ADMIN	-1.6281682746725066	LUNC	0	Robert Beaucage (filter) [REDACTED]
Oct 31, 2022 7:19 PM EDT [REDACTED]	ADMIN	-138.827608	ADA	0	Robert Beaucage (filter) [REDACTED]
Oct 31, 2022 7:19 PM EDT [REDACTED]	ADMIN	-0.036523741	DOT	0	Robert Beaucage (filter) [REDACTED]
Oct 31, 2022 7:19 PM EDT [REDACTED]	ADMIN	-0.39258334	DOGE	0	Robert Beaucage (filter) [REDACTED]
Oct 31, 2022 7:19 PM EDT [REDACTED]	ADMIN	-0.5011711885134457	LUNA	0	Robert Beaucage (filter) [REDACTED]
Oct 31, 2022 7:19 PM EDT [REDACTED]	ADMIN	-0.2623722450059489	ETH	0	Robert Beaucage (filter) [REDACTED]

Running balance breakdown:

Asset	Quantity as of July 6 th , 2022	ACH Returns Postpetition	Quantity After ACH Returns	October 31, 2022 Liquidation	Ending Balance
ADA	1419.1		1419.1	-138.827608	1280.2
BTC	0.632627		0.632627	-0.0618885	0.570739
DOGE	4		4	-0.39258334	3.6
DOT	0.373		0.373	-0.036523741	0.336
ETH	2.68198		2.68198	-0.262372245	2.41961
LLUNA	11.952		11.952		11.952
LUNA	5.123		5.123	-0.5011711885	4.621
LUNC	16.6		16.6	-1.628168275	15.0
SHIB	1,300,081,840		1,300,081,840	-127,183,986.13	1,172,897,854
VGX	503.41		503.41	-49.24814672	454.16
USD	\$1,369.18	-\$4,300.00	-\$2,930.82	\$2,930.82	\$0.00

Exhibit E

Deborah Soto's Account Activity

Funding attempts reflected in Voyager's system:

Deposits	Type	Amount	Asset	Instant Deposit	User	Status	Reason
Jun 12, 2022 2:54 PM EDT [REDACTED]	BANK	10,000	USD	0	deborah soto (lter)	ADMIN_DENIED	Insufficient funds
Jun 11, 2022 2:53 PM EDT [REDACTED]	BANK	10,000	USD	0	deborah soto (lter)	ADMIN_DENIED	Insufficient funds
May 23, 2022 8:22 PM EDT [REDACTED]	BANK	10,000	USD	0	deborah soto (lter)	ADMIN_DENIED	Insufficient funds
May 22, 2022 6:33 PM EDT [REDACTED]	BANK	10,000	USD	0	deborah soto (lter)	ADMIN_DENIED	Insufficient funds
Oct 27, 2021 10:41 AM EDT [REDACTED]	BANK	3,500	USD	0	deborah soto (lter)	ADMIN_DENIED	Insufficient funds
Sep 18, 2021 11:32 AM EDT [REDACTED]	BANK	5,000	USD	0	deborah soto (lter)	ADMIN_DENIED	Insufficient funds
May 19, 2021 9:40 AM EDT [REDACTED]	BANK	2,000	USD	0	deborah soto (lter)	ADMIN_DENIED	Suspected ACH Fraud
May 18, 2021 11:13 PM EDT [REDACTED]	BANK	1,000	USD	0	deborah soto (lter)	ADMIN_DENIED	Suspected ACH Fraud
May 12, 2021 9:00 PM EDT [REDACTED]	BANK	1,000	USD	0	deborah soto (lter)	ADMIN_DENIED	Insufficient funds
May 6, 2021 2:47 PM EDT [REDACTED]	BANK	1,000	USD	0	deborah soto (lter)	ADMIN_DENIED	Suspected ACH Fraud
Apr 22, 2021 10:30 PM EDT [REDACTED]	BANK	500	USD	0	deborah soto (lter)	ADMIN_DENIED	Insufficient funds
Apr 20, 2021 7:36 AM EDT [REDACTED]	BANK	200	USD	0	deborah soto (lter)	ADMIN_DENIED	Insufficient funds
Apr 15, 2021 10:37 PM EDT [REDACTED]	BANK	2,000	USD	0	deborah soto (lter)	ADMIN_DENIED	Rejected by auto-denial algorithm

Chargebacks reflected in Voyager's system:

Deposits	Type	Amount	Asset	Instant Deposit	User	Status	Reason
Apr 3, 2022 1:08 PM EDT [REDACTED]	BANK	10,000	USD	0	deborah soto (lter)	RETURNED	Insufficient funds
Apr 2, 2022 11:39 AM EDT [REDACTED]	BANK	10,000	USD	0	deborah soto (lter)	RETURNED	Insufficient funds
Jan 27, 2022 6:35 PM EST [REDACTED]	BANK	10,000	USD	0	deborah soto (lter)	RETURNED	Insufficient funds
Dec 5, 2021 10:58 AM EST [REDACTED]	BANK	500	USD	0	deborah soto (lter)	RETURNED	Insufficient funds
Dec 4, 2021 1:35 PM EST [REDACTED]	BANK	2,000	USD	0	deborah soto (lter)	RETURNED	Insufficient funds
Dec 4, 2021 9:00 AM EST [REDACTED]	BANK	5,000	USD	0	deborah soto (lter)	RETURNED	Insufficient funds
Aug 7, 2021 12:16 PM EDT [REDACTED]	BANK	1,000	USD	0	deborah soto (lter)	RETURNED	Insufficient funds
Apr 2, 2021 7:47 PM EDT [REDACTED]	BANK	2,000	USD	0	deborah soto (lter)	RETURNED	Insufficient funds
Mar 25, 2021 11:16 AM EDT [REDACTED]	BANK	1,000	USD	0	deborah soto (lter)	RETURNED	Insufficient funds
Mar 20, 2021 10:13 AM EDT [REDACTED]	BANK	500	USD	0	deborah soto (lter)	RETURNED	Insufficient funds
Mar 19, 2021 9:12 PM EDT [REDACTED]	BANK	500	USD	0	deborah soto (lter)	RETURNED	Insufficient funds
Mar 19, 2021 5:39 AM EDT [REDACTED]	BANK	200	USD	0	deborah soto (lter)	RETURNED	Insufficient funds